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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

MAIJOU MILLER,  
Plaintiff,

v.

FRANK BISIGNANO,  
COMMISSIONER OF SOCIAL  
SECURITY,  
Defendant.

Case No. 1:25-cv-00615-JLT-BAM  
STIPULATION AND ~~PROPOSED~~  
ORDER FOR EXTENSION OF  
TIME

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from August 22, 2025 to October 21, 2025, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due

1 on the same week. For the weeks of August 18, 2025 and August 25, 2025,  
2 Plaintiff's Counsel has eleven merit briefs due. Counsel requires additional time to  
3 brief the issues thoroughly for the Court's consideration. Defendant does not  
4 oppose the requested extension. Counsel apologizes to the Defendant and Court  
5 for any inconvenience this may cause.

6  
7 Respectfully submitted,

8 Dated: July 30, 2025

PENA & BROMBERG, ATTORNEYS AT LAW

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10 By: /s/ Jonathan Omar Pena  
11 JONATHAN OMAR PENA  
12 Attorneys for Plaintiff  
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14 Dated: July 30, 2025

KIMBERLY A. SANCHEZ  
United States Attorney  
MATHEW W. PILE  
Associate General Counsel  
Office of Program Litigation  
Social Security Administration

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20 By: \*/s/ Katherine Sarah Bowles  
21 Katherine Sarah Bowles  
22 Special Assistant United States Attorney  
23 Attorneys for Defendant  
24 (\*As authorized by email on July 30, 2025)  
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**ORDER**

Pursuant to the parties' stipulation and good cause appearing, Plaintiff shall have a 60-day extension of time, from August 22, 2025 to October 21, 2025, for Plaintiff to serve Defendant with Plaintiff's motion for summary judgement. All other dates in the Court's Scheduling Order shall be extended accordingly.

IT IS SO ORDERED.

Dated: August 1, 2025

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE